

HERRICK, FEINSTEIN LLP  
 John P. Sheridan  
 2 Park Avenue  
 New York, NY 10016  
 Telephone: (212) 592-1400  
 Facsimile: (212) 592-1500

Electronically Filed

Attorneys for Oliver Cromwell Owners, Inc.

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	No 07 Civ. 5924 (LLS)
	:	
- against -	:	<u>ANSWER</u>
	:	
ROBERT L. HARDING, DEBRA HARDING,	:	
OLIVER CROMWELL OWNERS, INC.,	:	
WASHINGTON MUTUAL BANK, CHERI LANE :	:	
BOWES, and ANDREW HARDING,	:	
	:	
Defendants.	:	
-----	x	

Defendant Oliver Cromwell Owners, Inc. ("Oliver Cromwell") by its attorney Herrick, Feinstein LLP for its answer to the complaint, alleges as follows:

INTRODUCTION

1. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 1 of the Complaint.
  
2. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 2 of the Complaint.

JURISDICTION AND VENUE

3. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 3 of the Complaint.

4. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 4 of the Complaint.

PARTIES

5. Denies knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 5 of the complaint except admits that

a) Robert Harding entered into a proprietary lease with Oliver Cromwell on or about January 29, 1985.

b) Robert Harding was issued 1086 shares of stock of Oliver Cromwell attributed to apt. 3E in the building known and located at 12 West 72<sup>nd</sup> St., New York, New York; and

c) Oliver Cromwell issued a stock certificate to Robert Harding naming him owner o the Stock.

6. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 6 of the Complaint except admits that Andrew Harding represented Robert Harding as attorney in fact in connection with the closing of the subject transaction.

7. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 7 of the Complaint.

8. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 8 of the Complaint.

9. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 9 of the Complaint.

**ANSWERING THE FIRST CLAIM FOR RELIEF**

10. Repeats and realleges each of its R&R answers to paragraph 1 through 9 above.

11. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 11 of the Complaint.

12. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 1 of the Complaint.

13. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 13 of the Complaint.

14. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 14 of the Complaint.

15. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 15 of the Complaint.

16. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 16 of the Complaint.

17. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 17 of the Complaint.

18. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 18 of the Complaint.

ANSWERING THE SECOND CLAIM FOR RELIEF

19. Repeats and realleges each of its R&R answers to paragraph 10 through 18 above.

20. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 20 of the Complaint.

21. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 21 of the Complaint.

22. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 22 of the Complaint.

23. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 23 of the Complaint.

24. Deny knowledge or information sufficient to form a belief as to each and every allegation set forth in paragraph 24 of the Complaint.

FIRST DEFENSE

25. The Complaint fails to state a claim against Oliver Cromwell upon which relief can be granted.

SECOND DEFENSE

26. Plaintiff's remedy, if any, against Oliver Cromwell lies in the judgment enforcement procedures established under New York State Law.

Dated: New York, New York  
December 14, 2007

  
John P. Sheridan  
jsheridan@herrick.com  
HERRICK, FEINSTEIN LLP  
Attorneys for Defendant  
Oliver Cromwell Owners, Inc.  
2 Park Avenue  
New York, NY 10016  
(212) 592-1400

TO: MICHAEL J. GARCIA  
United States Attorney for the  
Southern District of New York  
Attorney for the United States of America  
Attn: Rebecca C. Martin (RM 0486)  
Assistant United States Attorney  
86 Chambers Street, 3<sup>rd</sup> Floor  
New York, NY 10007  
(212) 637-2714